

**From:** [Coltrain, Katrina](#)  
**To:** [Todd Downham](#); [amy brittain](#)  
**Subject:** Electronic Copy of Letter: Draft Source Control Proposed Plan Wilcox Oil Company Superfund Site  
**Date:** Wednesday, February 7, 2018 11:35:00 AM  
**Attachments:** [State Letter Wilcox Source Control PP 2-5-18.pdf](#)

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Electronic Copy of Letter.  
Katrina Higgins-Coltrain  
Remedial Project Manager  
US EPA Region 6  
LA/OK/NM Section (6SF-RL)  
1445 Ross Avenue  
Dallas, Texas 75202  
214-665-8143

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**From:** Coltrain, Katrina  
**Sent:** Tuesday, February 06, 2018 8:46 AM  
**To:** Todd Downham ; amy brittain

**Subject:** Draft Source Control Proposed Plan Wilcox Oil Company Superfund Site

Todd, please find attached the electronic draft of the Source Control Proposed Plan. A formal letter requesting review is addressed to Amy Brittain and will arrive in the mail.

The purpose of this document is to propose cleanup action for the source areas we have identified as the remedial investigation continues. This document is specific to these source areas and will provide us with a pathway to address these areas earlier in the process and prior to completing the full site characterization and risk assessments. All remaining aspects of the site (e.g., remedial investigation, feasibility study, risk assessments, etc) will continue concurrent with this proposed plan. Final site-wide documentation will be provided in the remedial investigation report, the human health and ecological risk assessments, the feasibility study, and finally the site-wide decision document.

The documents attached are listed and described below. Once comments are received and incorporated, the document will be formatted to include the figures and text boxes in the appropriate locations and the document will be release to the public for review and comment. Thank you for your time and review. Please call with any questions.

Wilcox Source Control PP draft figures 2-6-18.pdf: site figures

Wilcox Source Control draft Proposed Plan text 2-6-18.docx: the prosed plan text.

Wilcox Source Control draft Proposed Plan text boxes2-6-18.docx: text box inserts that provide additional information on process.

Wilcox Source Control PP tables draft 2-6-18.docx: the prosed plan tables.

Katrina Higgins-Coltrain  
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

February 5, 2018

Ms. Amy Brittain  
Environmental Programs Manager  
Site Remediation Section  
Land Protection Division  
Oklahoma Department of Environmental Quality  
P.O. Box 1677  
Oklahoma City, OK 73 10 1-1 677

RE: Request for Review of the Source Control Proposed Plan and Identification of Applicable or Relevant and Appropriate Requirements for the Wilcox Oil company Superfund Site

Dear Ms. Brittain:

The U.S Environmental Protection Agency (EPA) requests your review of the Wilcox Oil Company Source Control Proposed Plan (Plan) and identification of any state Applicable or Relevant and Appropriate Requirements (ARARs). The EPA requests comments and identified ARARs within 30-days of the date of this letter.

The key item for which formal comments and/or input are being requested is the draft Plan which has been provided electronically to Oklahoma Department of Environmental Quality staff. The EPA Remedial Project Manager, Ms. Katrina Higgins-Coltrain, has corresponded with her State counterpart, Mr. Todd Downham, by phone and via e-mail in order to provide appropriate materials and to obtain input related to identifying an acceptable source control remedial response action.

Currently, the Wilcox Oil Company Superfund Site (site) is in the remedial investigation and feasibility study phase of the Superfund Process. During the course of the site investigation, source materials defined as material including or containing hazardous substances, pollutants or contaminants that act as a reservoir for migration of contamination to ground water, to surface water, to air, or acts as a source for direct exposure are identified. The Plan identifies seven (7) former tank areas, a separation pit, and the lead additive area as sources to be addressed. The Plan includes the evaluation of three options and is proposing Excavation and Offsite Disposal for the nine (9) identified source areas. The total estimated volume of source material is approximately 34,622 cubic yards at an estimated cost of \$5,260,232.

Although a final site investigation and determination of nature and extent of contamination has not been completed, taking appropriate source control actions at sites

during the investigation stage of the process is consistent with the National Contingency Plan (NCP) and existing EPA guidance. The NCP [40 CFR § 300.430(a)(1)] states, "Remedial actions are to be implemented as soon as site data and information make it possible to do so."

Under Section 121(d)(2)(A) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), the remedial actions must meet any Federal standards, requirements, criteria, or limitations that are determined to be legally applicable or relevant and appropriate requirements (ARARs) as well as any State ARARs that are more stringent than Federal requirements. Please provide the EPA with a list of ARARs as part of your review of the Proposed Plan.

We appreciate the Oklahoma Department of Environmental Quality's cooperation and coordination in addressing the cleanup issues associated with this site. As always, EPA appreciates the dedication of your staff in assisting us to achieve our overall goal of protecting human health and the environment. Should you have additional questions or concerns regarding the site, please contact the Remedial Project Manager, Ms. Katrina Higgins-Coltrain by electronic mail at [coltrain.katrina@epa.gov](mailto:coltrain.katrina@epa.gov) or by phone at (214) 665-8143. Please contact the site attorney, Mr. Marvin Benton by electronic mail at [benton.marvin@epa.gov](mailto:benton.marvin@epa.gov) or by phone at (214) 665-3190 with any legal questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Blake Atkins", with a stylized flourish at the end.

Blake Atkins,  
Section Chief  
LA/NM/OK Section